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8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 EPIC GAMES, INC.,

12 Plaintiff, Counter-Defendant,

13 v.

14 APPLE INC.,

15 Defendant, Counterclaimant.
16

CASE NO. 4:20-cv-05640-YGR

**DECLARATION OF SANGHOON PARK
IN SUPPORT OF EPIC GAMES INC.'S
ADMINISTRATIVE MOTION TO SEAL
TRIAL EXHIBITS**

DECLARATION OF SANGHOON PARK

I, Sanghoon Park, declare as follows:

1. I am a Vice President at Samsung Electronics Co., Ltd. ("SEC") with responsibility for Global Legal Affairs. I have been employed at SEC since 2004, and in the course of my employment have become familiar with SEC's treatment of its trade secrets and other proprietary business information, such as those discussed in this declaration. I make this declaration pursuant to Northern District of California Civil Local Rule 79-5(e)(1) in support of Epic Games' administrative motion to seal trial exhibits. I know the facts stated herein based on my own personal knowledge and, if called as a witness, I could and would testify competently thereto.

2. I understand that Epic Games, Inc. and Apple, Inc. intend to use at trial materials that include highly sensitive, confidential information of SEC. Those materials include potential trial exhibit DX-4153. Exhibit DX-4153 is a set of detailed notes concerning a May 17, 2018 meeting between executives at SEC and Epic Games. The notes reflect the terms of the proposed partnership between SEC and Epic Games, the strategy the two companies would employ going forward, the revenue sharing arrangement between the two companies, and Samsung's future product launches and related strategies. The public disclosure of exhibit DX-4153, which includes SEC's business analyses, strategies, and decision-making plans, could significantly harm SEC and its ability to conduct business, and could place it at a disadvantage with competitors who could use SEC's confidential information to their advantage. Exhibit DX-4153 has economic value from not being known to SEC's competitors or the public. It is SEC's practice to maintain as highly confidential all of its non-public, strategy-related documents and communications with its partners. SEC does not disclose strategy-related documents of this nature outside of SEC.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct. This declaration was executed this 6 day of May 2021, in Seoul, Korea.


Sanghoon Park